

# Exhibit 2

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

JEFFERSON GRIFFIN,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF  
ELECTIONS,

Defendant.

Case No. 5:24-cv-00731-BO

**DECLARATION OF WILLIAM DWORKIN**

I, William Dworkin, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.

2. I am the President of the North Carolina Alliance for Retired Americans (“the Alliance”), a 501(c)(4) nonprofit, social welfare organization incorporated in North Carolina. The Alliance has approximately 58,000 members across all of North Carolina’s 100 counties. The Alliance is a chartered state affiliate of the Alliance for Retired Americans, a nationwide grassroots organization with more than 4.3 million members.

3. The Alliance’s mission is to ensure social and economic justice and full civil rights for retirees. As a central part of its mission, the Alliance works to protect the rights of its members to vote and to have their votes be counted. The Alliance has strong interests in ensuring that the greatest number of our members are allowed to vote and have their votes counted, as well protecting policies that make voting safe, easy, and reliable for our members.

4. The Alliance undertakes a broad range of initiatives to enable its members to vote, including tabling at local events to register voters and get out the vote, canvassing before elections to educate voters about how and where to vote, and other voter turnout programming and communications.

5. The Alliance has also previously initiated and intervened in litigation in North Carolina to protect our members' ability to vote. *See, e.g., N.C. All. for Retired Ams. v. N.C. State Bd. of Elections*, Case No. 20-CVS-8881 (N.C. Super. Ct. Oct. 2, 2020) (Alliance challenged restrictive election procedures implemented during the COVID-19 pandemic); *see also Deas v. North Carolina State Board of Elections*, Case No. 22-CVS-11290 (Wake Cnty. Sup. Ct. Oct. 26, 2022) (granting intervention to Alliance in case involving voting rules); *In re Appeal of Declaratory Ruling from the State Board of Elections*, Case No. 22-CVS-10520 (Wake Cnty. Sup. Ct. Dec. 19, 2022) (same); *Moore v. Circosta*, No. 1:20CV911, 2020 WL 6597291, at \*2 (M.D.N.C. Oct. 8, 2020) (same).

6. As the Alliance engages members and the larger community of retired North Carolinians, it answers questions regarding voting requirements and procedures. For instance, during Alliance meetings, members discuss and learn about key issues and candidate positions, as well as about when and how they can cast their ballots.

7. Among other efforts, the Alliance develops and circulates a newsletter to educate its members about important issues facing older and retired Americans, including the voting process. The Alliance regularly communicates with its members to keep them aware of issues that could impact them, their rights, and their quality of life.

8. Alliance members tend to be civically engaged and therefore tend to vote at higher rates than the general public. Because we are an organization of retirees, Alliance members are

generally older individuals, and to my knowledge, the average age is between 60 and 70 years of age. Accordingly, many Alliance members have been registered to vote for decades, including prior to the enactment of federal and North Carolina laws requiring voters to provide a driver's license number or portion of a social security number with their registrations.

9. While the Alliance's members are civically engaged and tend to vote at high rates, they also often face challenges when voting. Due to their advanced age, our members often experience issues that come naturally with getting older, including difficulty with mobility, memory, vision, and administrative tasks. Many of our members no longer regularly leave home, and so they must plan significantly ahead for errands and other obligations, including voting.

10. Due to these limitations, Alliance members depend heavily on opportunities to vote by mail or alternatively vote early in-person at a time that is convenient for them and lets them avoid lines. Judge Griffin primarily seeks to disenfranchise mail and early voters who supposedly do not have driver's license or social security numbers in their voter registration files, meaning it directly targets voting methods preferred by Alliance members. Moreover, these challenges punish voters who have been registered to vote since before such numbers were required to register, which will also disproportionately impact Alliance members.

11. The Alliance has compared the list of voters being challenged with the Alliance's membership lists, and it appears that at least 41 Alliance members are at risk of having their ballots thrown out if the protests are successful. This is likely an underestimate considering the sweeping nature of Judge Griffin's requested relief and the Alliance's broad membership and constituency across North Carolina.

12. We reached out to the Alliance members targeted by these protests to inform them their ballots were being challenged and that they were at risk of disenfranchisement. We were

concerned that Alliance members would have difficulty responding to Judge Griffin's protests because many Alliance members have limited familiarity and fluency with new technology, including QR codes like those included on the postcards Judge Griffin sent to voters whose ballots are being challenged. Many Alliance members also do not have the mobile smartphones necessary to access QR codes and thus face a heightened risk of never learning whether their votes are being challenged, or on what basis.

13. Indeed, none of the Alliance members we contacted recalled receiving any correspondence from Judge Griffin or the North Carolina Republican Party about the protests and confirmed that, even if they had, they would not have been able to learn more information because they do not have smartphones and are unfamiliar with QR codes or how to use them. Every single one of these Alliance members we contacted is a long-time North Carolina voter who has never before faced a problem voting under their current registration.

14. I am deeply concerned that if the protests are successful, Alliance members and other non-member retirees whose interests we seek to protect will have their votes thrown out in this election and it will be harder for them to vote—and for the Alliance to help protect our members' ballots—in future elections. Moreover, if our members' votes are discarded or they are unable to vote in future elections, our mission to ensure social and economic justice and full civil rights for retirees will be frustrated.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 30, 2024

/s/ William Dworkin

William Dworkin

President

North Carolina Alliance for Retired  
Americans